

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

_____	:	
RUTH V. BRIGGS,	:	
	:	
Plaintiff,	:	
	:	CIVIL ACTION NO. 16-00248
v.	:	
	:	
TEMPLE UNIVERSITY,	:	
	:	
Defendant.	:	
_____	:	

PLAINTIFF'S PROPOSED VERDICT SHEET

I. RETALIATION

1. Did Ruth Briggs prove that it is more likely than not that Temple retaliated against her because she complained of age discrimination?

Yes _____ No _____

If you answered "Yes," please skip Question 2 and proceed to Question 3.

If you answered "No," please proceed to Question 2.

2. Did Ruth Briggs prove that it is more likely than not that her complaints of age discrimination played a role in Temple's conduct toward her?

Yes _____ No _____

Please proceed to next Question.

3. Did Ruth Briggs prove that it is more likely than not that Temple retaliated against her because she complained of sex discrimination?

Yes _____ No _____

**If you answered "Yes," please skip Question 4 and proceed to Question 5.
If you answered "No," please proceed to Question 4.**

4. Did Ruth Briggs prove that it is more likely than not that her complaints of sex discrimination played a role in Temple's conduct toward her?

Yes _____ No _____

Please proceed to next Question.

II. AGE

5. Did Ruth Briggs prove that it is more likely than not that she was discriminated against because of her age?

Yes _____ No _____

**If you answered "Yes," please skip Question 6 and proceed to Question 7.
If you answered "No," please proceed to Question 6.**

6. Did Ruth Briggs prove that it is more likely than not that her age was a motivating factor in Temple's conduct toward her?

Yes _____ No _____

Please proceed to next Question.

III. SEX

7. Did Ruth Briggs prove that it is more likely than not that she was discriminated against because of her sex?

Yes _____ No _____

If you answered "Yes," please skip Question 8 and proceed to Question 9.

If you answered "No," please proceed to Question 8.

8. Did Ruth Briggs prove that it is more likely than not that her sex was a motivating factor in Temple's conduct toward her?

Yes _____ No _____

If you answered "Yes" to at least one of the above Questions, please proceed to Question 9. If you answered "No" to all of the above questions, your deliberations are over. You have found in favor of Temple. Please sign and date this Verdict Form.

9. Please state the amount of damages allotted to Plaintiff, Ruth Briggs, for:

Back Pay _____

Front Pay _____

Emotional Harm _____

If you answered “Yes” to Questions 1 and/or 5, please proceed to Question 10. If you answered “No” to both Questions 1 and 5, please proceed to the Instruction after Question 10.

10. Did Ruth Briggs prove that it is more likely than not that Temple either knew or showed reckless disregard for whether its conduct was prohibited by anti-discrimination laws?

Yes _____ No _____

If you answered “Yes” to Questions 3 and/or 7, please proceed to Question 11. If you answered “No” to both Questions 3 and 7, your deliberations are complete; please sign and date this Verdict Form.

11. Did Ruth Briggs prove that it is more likely than not that Temple showed reckless indifference to Ms. Briggs’s federally protected rights?

Yes _____ No _____

Your deliberations are complete; please sign and date this Verdict Form.

SO SAY WE ALL THIS _____ day of JULY, 2018.

FOREPERSON

Respectfully submitted,

CONSOLE MATTIACCI LAW, LLC

Date: July 10, 2018

BY: /s/Laura C. Mattiacci

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Attorney for Plaintiff,
Ruth V. Briggs

CERTIFICATE OF SERVICE

I, Laura C. Mattiacci, Esquire, hereby certify that Plaintiff's Proposed Verdict Sheet has been filed electronically and is available for viewing and downloading from the ECF system on this 10th day of July, 2018. Attorneys for Defendant (Richard R. Harris and Rachel F. Satinsky, Littler Mendelson, P.C.) are registered users of the Court's ECF System.

BY: /s/Laura C. Mattiacci

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Ruth V. Briggs